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CHARLES ELMORE CROPLEY
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Supreme Court of the United States

OCTOBER TERM—1942

Nos. 299 and 329

JERSEY CENTRAL POWER & LIGHT COMPANY
Petitioner,

vs.

FEDERAL POWER COMMISSION
Respondent.

NEW JERSEY POWER & LIGHT COMPANY
Petitioner,

vs.

FEDERAL POWER COMMISSION
Respondent.

MEMORANDUM IN SUPPORT OF PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES CIRCUIT COURT OF APPEALS FOR THE THIRD CIRCUIT FILED BY THE ATTORNEY GENERAL OF THE STATE OF CONNECTICUT

FRANCIS A. PALLOTTI,
Attorney General for the State of Connecticut
State Capitol
Hartford, Connecticut

September 30, 1942

SUPREME COURT OF THE UNITED STATES

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The undersigned, Attorney General of the State of Connecticut, respectfully requests that the Court grant certiorari in the two above captioned cases. The reason for the request on the part of the undersigned that certiorari be granted is because the questions involved in these two above captioned cases appear to be of extreme importance to the Public Utilities Commission of the State of Connecticut, and also to several public utility companies doing business in this State, two of which companies are presently engaged in litigation with the Federal Power Commission over questions similar to those involved in the two above captioned cases. In the opinion of the under-

signed, a decision by the Supreme Court of the United States of the two above captioned cases at this time would be helpful to the Public Utilities Commission of the State of Connecticut, and to public utility companies in Connecticut.

It is my understanding that the two above captioned cases in which the Court is requested to grant certiorari involve questions concerning the extent of the jurisdiction of the Federal Power Commission over public utility companies, which operate within a single state. Similar questions, I am informed, are involved in other pending cases. One of these is the case of *The Hartford Electric Light Company v. Federal Power Commission*, pending in the United States Circuit Court of Appeals for the Second Circuit, and another is the case of *The Connecticut Light and Power Company v. Federal Power Commission*, pending in the United States Court of Appeals for the District of Columbia. I am also informed that there is another case pending before the Federal Power Commission, known as In the Matter of *The Ohio Public Service Company*, Federal Power Commission Docket No. IT 5663.

In view of the importance of the matters involved in all of these cases, and the probability of further litigation on this question of the jurisdiction of the Federal Power Commission an authoritative decision by the Supreme Court of the United States would seem most desirable.

Respectfully submitted,

FRANCIS A. PALLOTTI,

Attorney General for the State of Connecticut.